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April 22, 2015

Via ECF

The Honorable James C. Francis
United States Magistrate Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Nunez, et al. v. City of New York, et al., No. 11-cv-5845 (LTS) (JCF)

Dear Judge Francis:

This firm serves as co-counsel for plaintiff and class representative Oscar Sanders in the above action. Mr. Sanders is currently incarcerated at Gowanda Correctional Facility in the custody of the New York State Department of Corrections and Community Supervision ("DOCCS"). We need to bring Mr. Sanders to New York City for testing and evaluation by a possible expert witness in this matter.¹ We have conferred with counsel for DOCCS, who informed us that a Court order was required.

Enclosed please find a proposed order directing DOCCS to move Oscar Sanders to a correctional facility close to New York City and to produce Mr. Sanders to the offices of Dr. David Kamelhar at 38 E. 32nd Street #601, New York, NY 10016 for medical tests relating to this case on April 29, 2015, next week, which is when Dr. Kamelhar is available. Mr. Sanders agrees to bear the costs for this trip. Counsel for DOCCS has reviewed the proposed order. Defendant City of New York does not object to this request.

¹ Because Mr. Sanders is a class representative and class discovery has been stayed, there is currently no schedule for expert discovery for Mr. Sanders and the other class representatives (unlike the individual plaintiffs).

Given the short time frame for this appointed date, we respectfully request the Court's attention to this matter as soon as possible.

Respectfully Submitted,

/s
Zoe Salzman

Encl.

- c. All counsel of record (*via ECF*)
Thomas Sticht, Superintendent, Gowanda Correctional Facility (*by fax*)
Herman Reinhold, DOCCS Legal Counsel (*by email*)
Office of the Attorney General of the State of New York (*by fax and hand*)